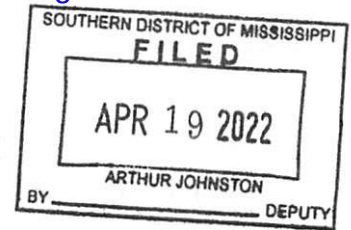


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. **3:22-cr-50-TSL-FKB**

TERRY MILLER, JR. and
SABE NICHOLSON

18 U.S.C. § 922(g)(1)
18 U.S.C. § 922(d)(1)

The Grand Jury charges:

COUNT 1

On or about February 11, 2022, in Lauderdale County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TERRY MILLER, JR.**, knowing he had previously been convicted of a crime which is punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, and the firearm was in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 2

On or about February 11, 2022, in Lauderdale County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SABE NICHOLSON**, knowingly disposed of a firearm to Terry Miller, Jr., knowing and having reasonable cause to believe that Terry Miller, Jr. had been convicted of a crime punishable by imprisonment for a term exceeding one year.

All in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense as alleged in this Indictment, the defendants, **TERRY MILLER, JR. and SABE NICHOLSON**, shall forfeit to the United States all

property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offense.

The Grand Jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of the offense alleged in this Indictment:

- (1) **Smith & Wesson pistol, model M&P 9C, 9mm caliber, serial number HAN4434;**
and
- (2) **Any ammunition seized.**

Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Section 924(d)(1); and Title 28, United States Code, Section 2461(c).


DARREN J. LAMARCA
United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This Indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 19th day of April 2022.


UNITED STATES MAGISTRATE JUDGE